

**REMARKS**

Claims 1-10 stand rejected under 35 U.S.C. 102(b) as being anticipated by Takada (U.S. Patent No. 6,359,652). Claims 1-10 are also rejected under 35 U.S.C. 102(e) as anticipated by Tanaka et al (U.S. Patent No. 7,218,732)

Independent claims 1 and 6, as amended, are clearly distinguishable over Takada and Tanaka. In particular, those claims now recite that "each of said latching portions comprises a second elastic member standing at a periphery of an attachment area of said housing to which the camera module is attached, and a prong portion which can engage with a latching surface of said cover member, said prong portion being provided on said second elastic member and projecting towards said latching surface, the plurality of second elastic members are elastically deformed, the camera module is allowed to pass through a space between the second elastic members, and attachment of the camera module to the attachment area of the housing is permitted." As discussed below in more detail, Takada and Tanaka do not disclose or suggest those features. Accordingly, Applicants submit claims 1 and 6 (and the remaining dependent claims 4, 5, 9 and 10) are not anticipated by Takada or Tanaka.

Claims 1, 4, 5, 6, 9 and 10 Are Not Anticipated By Takada (U.S. Patent No. 6,359,652)

As explained in Takada, Takada is principally directed to a mounting structure for a photographic element (e.g., CCD element) of a camera. In addition to easy mounting, an object of the Takada mounting structure is to reduce the amount of radiation generated at the photographic element and plate that would otherwise escape to the periphery. In Takada, the mounting structure is described as adapted for mounting the photographic element to the camera not a portable terminal device. In contrast, the claimed invention is more generally directed to a

structure for attaching the camera module to a housing. That is, an object of the present invention is not only to ensure the impact endurance quality but also to improve the operation quality for attaching the camera module to the housing of for example a portable terminal device. Takada is not concerned with making easier the attachment of the camera module to a housing. Thus, the claimed invention is different from Takada in objectives and application.

Takada is different in several respects. First Takada is different in that the photographic direction side of the substrate on which the photographic element is mounted is covered with the chassis of the module, and the mounting plate is attached to the back surface side of the substrate. See Figure 6 of Takada (substrate 310, chassis 320, mounting plate 350). The mounting plate pushes the back surface side of the substrate using springs and engages with the chassis so that the chassis of the module is not removed. Furthermore, in Takada, as shown in Figure 4, the opening (aperture brim 321) is formed on the chassis side 320 of the camera module. Also, the projection portions 336, 337, and the like are provided within the opening. The engagement holes (e.g., 354) and the spring are provided at the mounting plate 350 side.

In contrast, in the claimed invention, only latching portions having the elasticity are provided on the housing ("each of said latching portions comprises a second elastic member standing at a periphery of an attachment area of said housing to which the camera module is attached, and a prong portion which can engage with a latching surface of said cover member"), and specific structures such as the opening and projection portion are not provided at the camera module side. Claims 1 and 6 as amended further require "said prong portion being provided on said second elastic member and projecting towards said latching surface, the plurality of second elastic members are elastically deformed, the camera module is allowed to pass through a space between the second elastic members, and attachment of the camera module to the attachment

area of the housing is permitted." Therefore, in the claimed invention, an attachment structure for attaching the camera module to a housing of for example a portable terminal device can be obtained wherein the impact endurance quality is ensured, and the operation quality for attaching the camera module to the housing is excellent.

Those features of claims 1 and 6 are not disclosed or suggested in Takada. Accordingly, claims 1 and 6, as well as dependent claims 4, 5, 9 and 10 are not anticipated by Takada.

Claims 1, 4, 5, 6, 9 and 10 Are Not Anticipated By Tanaka (U.S. Patent No. 7,218,732)

The pending claims are different from Tanaka in several respects. Tanaka describes a portable terminal in which the cushioning member is disposed on the back surface of the camera module, and weakens the impact. However, the camera module is fixed by sandwiching cases 131 and 132. Additionally, Tanaka discloses a different latch system.

In the claimed invention, the camera module is fixed on only one case among two cases before the two cases are connected to each other. That is, the latch in the present invention is provided on only one side of the housing. In Tanaka, cushioning member 18 supports the camera module on one side. However, cushioning member 18 is not formed on the housing at the back surface side of the camera module, and does not elastically deform to engage with the camera. See claims 1 and 6 ("said prong portion being provided on said second elastic member and projecting towards said latching surface, the plurality of second elastic members are elastically deformed, the camera module is allowed to pass through a space between the second elastic members, and attachment of the camera module to the attachment area of the housing is

permitted"). Therefore, in Tanaka, only when the two housings are combined are the two housings fixed. In contrast, in the claimed invention, because the camera module can be fixed on the housing before the two housings are connected to each other, the assembly of the present invention is easier than that of Tanaka.

Additionally, when the cushioning member in Tanaka is positioned at the back of side of the camera module, the camera module is shaken, and the two housings become unstable when the two housings are combined. In contrast, in the present invention, stability can be maintained.

As with Takada, those features of claims 1 and 6 are not disclosed or suggested in Tanaka. Accordingly, claims 1 and 6, as well as dependent claims 4, 5, 9 and 10 are not anticipated by Tanaka. Furthermore, Applicant is entitled to a foreign priority date that precedes the US filing date of Tanaka. If the above arguments are found not persuasive, Applicant will file an English translation of the priority document and a statement by the translator that such translation is accurate.

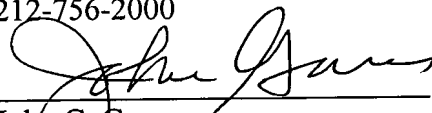
For at least the reasons set forth above, Applicant respectfully submits that claims 1, 4, 5, 6, 9 and 10, as amended, are in condition for allowance. Reconsideration and prompt allowance of this application are respectfully requested. The Examiner is urged to telephone Applicant's undersigned counsel at the number noted below if it will advance the prosecution of this application, or with any suggestion to resolve any condition that would impede allowance.

In the event that any extension of time is required, Applicant petitions for that extension of time required to make this response timely. Kindly charge any additional fee, or credit any surplus, to Deposit Account No. 50-0675, Order No. 848075-0062.

Respectfully submitted,

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